

EXHIBIT C

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA

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|--------------------------|---|----------------------|
| _____ |) | |
| ANAS ELHADY, et al. |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | Case No. 1:16-cv-375 |
| |) | |
| CHARLES H. KABLE, et al. |) | |
| |) | |
| Defendants. |) | |
| _____ |) | |

ADDENDUM TO SUPPLEMENTAL RESPONSE

In response to Plaintiffs' further inquiries regarding screening by governmental agencies of personnel connected to private entities against the Terrorist Screening Database (TSDB), the Terrorist Screening Center (TSC) provides the following addendum to its supplemental response to Interrogatory 30 directed to the TSC and related questions at the March 1, 2018 deposition of Timothy P. Groh:


In addition to the screening described in the supplemental response, the following memoranda of understanding (MOUs) (all of which were either provided to Plaintiffs or identified on privilege logs) envision some screening by government agencies of personnel connected to private entities against the TSDB:

- **Nuclear Regulatory Commission (NRC) (TSCD0061):** Screening in connection with NRC's mission to regulate licensed materials and activities and screening of individuals attempting to access facilities regulated by the NRC.

- **Overseas Private Investment Corporation (OPIC) (TSCD0060):**
Screening of individuals associated with OPIC's loan, loan guarantee, and insurance transactions.
- **U.S. Agency for International Development (USAID) (TSCD0045 and TSCD0048):** Screening in connection with USAID benefits.
- **Special Investigator General for Afghanistan Reconstruction (SIGAR) (TSCD0047):** Screening in connection with SIGAR's oversight of Afghanistan reconstruction projects and activities.
- **National Institute for Occupational Safety and Health (TSCC0009):**
Screening of enrollees in the World Trade Center Health Program.

Such screening may result in ineligibility for certain access or certain positions or denial of benefits, consistent with the duties and authorities of the screening agencies. These MOUs do not contemplate any TSDB export to private entities or access by those private entities to the TSDB.

For the Response:



Timothy P. Groh
Deputy Director for Operations
Terrorist Screening Center